

MAR 02 2021

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

Plaintiff,

VS.

Defendant.

))))))))

) No.

1:21CR00037 SNLJ/ACL

) Title 18 U.S.C. §§ 1343, 1028A

COUNT I

At all times material to this Indictment:

1. The defendant, Angelica A. Woods, (“Woods”) was employed by Bootheel In-Home Care Services in Mississippi County (BICS), in the Eastern District of Missouri. Part of her job duties at BICS included going to homes of elderly BICS clients to provide in-home health services for them.

2. Woods was hired on June 15, 2015, by BICS, and was terminated from employment with BICS on or about January 17, 2020.

3. As part of her employment responsibilities for BICS, Woods went to homes of elderly BICS clients to provide in-home health services for them. During her employment with BICS, Woods became acquainted with a BICS client, whose initials are ARC, while providing in-home health services to and for her.

4. Beginning on or about October 11, 2018, and continuing through about November 15, 2018, in Mississippi County within the Eastern District of Missouri and elsewhere, Woods devised a scheme to defraud Sallie Mae Bank and ARC residing in Mississippi County Missouri, by false and fraudulent representations to obtain a student loan for another person.

5. Beginning on or about October 11, 2018, and continuing through about November 15, 2018, in Mississippi County within the Eastern District of Missouri and elsewhere, Woods knowingly and willfully devised, and intended to devise a scheme and artifice to defraud Sallie Mae Bank and ARC in order to fraudulently obtain money, a student loan from Sallie Mae Bank, by means of materially false and fraudulent pretenses, representations and promises ("the scheme to defraud"), and in execution of the scheme and artifice to defraud, caused writings, signs and signals to be transmitted by wire in interstate commerce.

C. MEANS AND METHODS OF THE SCHEME AND ARTIFICE TO DEFRAUD

6. As part of the scheme to defraud, Woods, without the knowledge of and authorization from ARC, fraudulently and without consent of ARC, used ARC's name, date of birth, and social security number to falsely represent her to be a co-signor and co-obligor of a promissory note executed by another person for a student loan in the amount of \$18,000.00. On or about November 6, 2018, Woods completed or caused to be completed an Application Promissory Note that was submitted via the internet online, in interstate commerce, using ARC's name, date of birth, and social security number, as a co-signor to enable another person to qualify for a student loan. Based on false and fraudulent misrepresentations by Woods, including falsely posing as ARC and fraudulently using ARC's name, date of birth, and social security number, another person obtained a student loan from Sallie Mae Bank in the amount of \$18,000.00, the proceeds of which were transmitted via wire transfer in interstate commerce on

or about November 15, 2018. Woods fraudulently caused student loan proceeds in the approximate amount of \$18,000.00 to be sent to Missouri Welding Institute located in Nevada, Missouri, via wire transfer in interstate commerce as directed by lender Sallie Mae Bank.

7. As a result of the foregoing scheme and artifice to defraud and obtain money, Woods unlawfully obtained, and caused to be unlawfully obtained, student loan proceeds for the benefit of another person, in the amount of \$18,000 to which that person was not entitled, on or about November 15, 2018.

THE CHARGES

THE GRAND JURY CHARGES THAT:

8. Beginning on or about October 11, 2018, and continuing through about November 15, 2018, in Mississippi County, within the Southeastern Division of the Eastern District of Missouri, and elsewhere, the defendant,

ANGELICA A. WOODS,

devised and intended to devise a scheme to defraud, and for the purpose of executing the aforesaid scheme and artifice to defraud, and to obtain money by means of materially false and fraudulent pretenses and representations, on or about November 6, 2018, did transmit and caused to be transmitted in interstate commerce, by means of wire communications, writings, signs and signals, a false and fraudulent Application Promissory Note using the means of identification of another person, to obtain a student loan in the amount of \$18,000.00, and the subsequent disbursement of fraudulently obtained student loan proceeds transferred via wire communications transmitted in interstate commerce, all in violation of Title 18, United States Code, Section 1343.

COUNT II

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 6, 2018, in Mississippi County, within the Southeastern Division of the Eastern District of Missouri, and elsewhere, the defendant,

ANGELICA A. WOODS,

did knowingly possess and use, without lawful authority, means of identification of another person, being the person's name, birth date, and Social Security Number, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: wire fraud in violation of 18 U.S.C. § 1343 as charged in Count I of this Indictment, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL.

FOREPERSON

SAYLER FLEMING
UNITED STATES ATTORNEY

PAUL W. HAHN, #33190MO
ASSISTANT UNITED STATES ATTORNEY